

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

IN RE:

STEWARD HEALTH CARE SYSTEM, LLC,
et al.¹

Case No.: 24-90213-CML
Chapter 11

(Jointly Administered)

**JOINDER OF THE FLORIDA AGENCY FOR HEALTH CARE
ADMINISTRATION IN THE OBJECTION OF COMMONWEALTH OF
PENNSYLVANIA TO EMERGENCY MOTION OF DEBTORS FOR ENTRY OF AN
ORDER (I) APPROVING (A) FUNDING FROM THE COMMONWEALTH OF
MASSACHUSETTS FOR THE PLANNED TRANSITION AND SALE OF
MASSACHUSETTS HOSPITALS (B) THE CLOSURE OF CARNEY HOSPITAL AND
NASHOBA VALLEY MEDICAL CENTER, AND (C) PROCEDURES RELATED TO
FACILITY CLOSURES; AND (II) GRANTING RELATED RELIEF (Doc. No. 1767)**

The Florida Agency for Health Care Administration (“AHCA”), by and through its undersigned counsel, files this Joinder in the Objection of the Commonwealth of Pennsylvania [Doc. No. 1767] to the Emergency Motion of Debtors for Entry of an Order (I) Approving (A) Funding From the Commonwealth of Massachusetts for the Planned Transition and Sale of Massachusetts Hospitals (B) the Closure of Carney Hospital and Nashoba Valley Medical Center, and (C) Procedures Related to Facility Closures; and (II) Granting Related Relief [Doc. No. 1711] filed by Steward Health Care System LLC (the “Debtors”) on July 26, 2024, (the “Motion”), and respectfully states:

1) AHCA is the agency responsible for the operation and, if necessary, the potential closure of any of the Debtors’ eight (8) hospitals located in the State of Florida. These hospitals

¹ A complete list of the Debtors in these Chapter 11 cases may be obtained on the website of the Debtors’ claims and noticing agent at <https://restructuring.ra.kroll.com/steward>. The Debtors’ service address for these Chapter 11 cases is 1900 N. Pearl Street, Suite 2400, Dallas, TX 75201.

are in the “second round” of auctions contemplated by the Debtors and it is not known if there will be any hospital closures in Florida.

2) The Motion seeks broad relief with respect to procedures related to potential Florida hospital closures that should not be considered at the emergency hearing on Massachusetts hospital closures scheduled by the Debtors on only two (2) business days’ notice. AHCA joins with Pennsylvania and requests that Florida be entirely carved out of the requested relief sought in the Motion as it relates to possible hospital closures.

Reservation of Rights

3) AHCA reserves any and all rights to amend or supplement this Joinder and Objection and to raise additional objections at the hearing on this matter.

DATED THIS 31st day of July, 2024.

/s/ James M. Donohue
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ATTORNEYS FOR
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HEALTH CARE ADMINISTRATION

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been filed via ECF system resulting in electronic copies being furnished to all parties registered to receive same in this bankruptcy case on this 31st day of July, 2024.

/s/ James M. Donohue

James M. Donohue